DOCKET SECTION

POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001 [28 5 3 00 75 75]

CLASSIFICATION AND FEES FOR WEIGHT-AVERAGED) Docket No. MC99-2 NONLETTER-SIZED BUSINESS REPLY MAIL, 1999

DISTRICT PHOTO INC., YORK PHOTO LABS,
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.,
COMMENTS IN SUPPORT OF THE POSTAL SERVICE'S
MOTION REQUESTING PROTECTIVE CONDITIONS FOR
WORKPAPER I OF LESLIE SCHENK
(April 5, 1999)

District Photo Inc. ("District"), York Photo Labs (hereinafter "York"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") (referred to herein collectively as "DYMS") hereby submit their comments in support of the Postal Service's Motion Requesting Protective Conditions for Workpaper I of Witness Leslie Schenk, filed March 10, 1999.

The Postal Service states that Schenk Workpaper I contains proprietary information regarding participants in the Nonletter-sized Business Reply Mail weight-averaging experiment, including District, Mystic, and Seattle. Participants in the Postal Service's experiment were promised confidentiality by the Postal Service, and this promise should not be compromised. Failure to impose protective conditions would chill participation in future classification experiments and Postal Service data collection efforts.

DYMS each agree with the Postal Service that all volume, postage and fee, weight, and other data concerning individual participants in the experiment is highly proprietary, and should be protected from public disclosure, and especially from disclosure to other participants in the experiment, all of whom are competitors with each other in the mail-order photofinishing industry. The protective conditions proposed by the Postal Service appear to

afford reasonable protection for the proprietary data of each of the participants in the experiment.

Respectfully submitted,

William J. Olson

John S. Miles

Alan Woll

John Callender

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3823

(703) 356-5070

Counsel for District Photo Inc., York Photo Labs, Mystic Color Lab, and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

William J. Olsoph

April 5, 1999